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January 5, 2024

Honorable Rukhsanah L. Singh, U.S. Magistrate Judge
United States Magistrate Judge for The District Court of New Jersey
Clarkson S. Fisher Bldg. & US Courthouse
402 East State Street, Court Room 7W
Trenton, NJ 08608

**Re: *In Re: Johnson & Johnson Talcum Powder Products, Marketing, Sales Practices,
and Products Liability Litigation – MDL 2738***

This document relates to:

Brooks, Kristy – 3:17-cv-11694
Davis, Deborah – 3:17-cv-05555
Milner, Tonjerelle – 3:17-cv-10886
Jones, Kirra – 3:17-cv-10739
Lauvas, Trudy – 3:17-cv-114467
Stansfield, Merritt – 3:17-cv-12167
Pachov, Ashley – 3:17-cv-10772
Pearson, Mary – 3:17-cv-10892
Ragsdale, Lana – 3:17-cv-10860
Perdue, Amelia – 3:17-cv-10720
Green, Johnathan – 3:17-cv-11743
Thomas, Tanya – 3:17-cv-12923
White, Deborah – 3:17-cv-12925

Dear Magistrate Judge Singh:

I am writing to bring to your attention certain discovery disputes that have arisen in the aforementioned cases. On December 14, 2023, Johnson & Johnson (J&J) filed a PPF Deficiency Notice letter with the Court. (Dkt. No. 28797). Attached to J&J's letter was Exhibit A that listed thirteen cases represented by The Miller Firm that J&J alleged failed to produce discovery. On December 19, 2023, counsel for plaintiffs emailed counsel for J&J and noted his confusion as to why J&J was asserting such claims as eleven of the thirteen plaintiffs listed by J&J had responded to discovery by November 17, 2023. Upon further notice from J&J's counsel of a deficient discovery response in the White (3:17-cv-12925) case, counsel for plaintiffs took immediate steps to resolve the issue. Once the issue was resolved, counsel for J&J responded that they would remove Brooks, Davis, Milner, Jones, Stansfield, Pachov, Pearson, Ragsdale, Perdue, Green, Thomas, and White from their deficiency list. The Lauvas (3:17-cv-114467) case was stipulated to by both parties and dismissed on January 2, 2023. (Dkt No. 10).

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It is the undersigned's position that all issues related to J&J's December 14th letter have been resolved, but counsel for the plaintiffs will be present at the January 10th telephone conference to answer any questions that the Court may have.

Very truly yours,

/s/ Jeff T. Seldomridge

Jeff Seldomridge, Esq.

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cc: All Counsel of Record (via ECF)